

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in compliance with D.N.J. LBR 9004-1(b)	
<b>PADGETT LAW GROUP</b> Joshua I. Goldman, Esq. 6267 Old Water Oak Road, Suite 203 Tallahassee, FL 32312 (850) 422-2520 (telephone) (850) 422-2567 (facsimile) <a href="mailto:Josh.Goldman@padgettlawgroup.com">Josh.Goldman@padgettlawgroup.com</a> <i>Attorneys for MCLP ASSET COMPANY, INC.</i>	
In Re:	
<b>Steven H Zimmerman,</b>	
Debtor(s).	

Case No.: 18-31536-MBK

Chapter 13

Hearing Date: 06/25/2025

Judge: Michael B. Kaplan

**RESPONSE TO DEBTOR’S MOTION TO CORRECT MORTGAGE STATEMENT**  
**[D.E. 95]**

COMES NOW, Creditor, MCLP ASSET COMPANY, INC. (“Secured Creditor”), and files this written response to the Debtor’s Motion to Correct Mortgage Statement (D.E. 95), and as grounds therefor states:

1. MCLP ASSET COMPANY, INC. is a secured creditor and filed Amended Claim 5-2 (“the Claim”) in the instant case reflecting a secured claim against the Debtor’s property, 1 Academic Road, East Brunswick, NJ 08816, in the amount of \$302,937.51.
2. On May 20, 2025, the Debtor filed this Motion to Correct Mortgage Statement [D.E. 95].
3. As of June 13, 2025, the loan is due for May 1, 2025 through June 1, 2025 (2 payments at \$2,738.11 each), less a suspense balance of \$1,689.61, for a total default of \$3,786.61. A payment history is attached as Exhibit A.

WHEREFORE, MCLP ASSET COMPANY, INC. requests that this Court deny the Debtor's Motion to Correct Mortgage Statement.

Date: June 16, 2025

**PADGETT LAW GROUP**  
By: /s/ Joshua I. Goldman  
Joshua I. Goldman, Esq.  
6267 Old Water Oak Road, Suite 203  
Tallahassee, FL 32312  
(850) 422-2520 (telephone)  
(850) 422-2567 (facsimile)  
[Josh.Goldman@padgettlawgroup.com](mailto:Josh.Goldman@padgettlawgroup.com)

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
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In Re:  <b>Steven H Zimmerman,</b>  Debtor(s).

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### CERTIFICATION OF SERVICE

- I, Kelly DeSousa:
  - ☐ represent \_\_\_\_\_ in the above-captioned matter.
  - ☒ am the secretary/paralegal for Padgett Law Group, who represents the Creditor in the above captioned matter.
  - ☐ am the \_\_\_\_\_ in the above case and am representing myself.
- On June 16, 2025, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below: ***Response to Motion to Correct Mortgage Statement, Certificate of Service***
- I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.
- I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: June 16, 2025

/s/ Kelly DeSousa  
Kelly DeSousa

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
<b>Steven H Zimmerman</b> 1 Academic Road East Brunswick, NJ 08816	DEBTOR	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.*)"
<b>Robert C. Nisenson</b> Robert C. Nisenson, LLC 10 Auer Court Suite E East Brunswick, NJ 08816	DEBTORS' ATTORNEY	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.*)"
<b>Albert Russo</b> Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	TRUSTEE	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.*)"

\* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.

**EXHIBIT A**

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Zimmerman

		Payment Changes	Eff Date	P & I	Escrow	Total	Was PCN/POC filed?	Was the Change Higher?	Tracking Prior servicer Suspense at time of transfer	
Acquisition Date		POC	2/1/2019	\$ 1,289.74	\$ 1,242.25	\$ 2,531.99	Yes	N/A	All Pmts Rcvd	\$ 93,039.19
Account #		Change #1	5/1/2019	\$ 1,289.74	\$ 1,161.04	\$ 2,450.78	Yes	N/A	All Amts Paid	\$ 87,030.86
Case #	18-31536	Change #2	5/1/2020	\$ 1,289.74	\$ 1,196.05	\$ 2,485.79	Yes	N/A	UAF	\$ 6,008.33
Filing Date	10/30/2018	Change #3	5/1/2021	\$ 1,289.74	\$ 1,224.38	\$ 2,514.12	Yes	N/A	UAF received	\$ 5,321.37
Post Due Date	11/1/2018	Change #4	5/1/2022	\$ 1,289.74	\$ 1,241.03	\$ 2,530.77	Yes	N/A	Difference	\$ 686.96
Post Admin Claim?	Yes	Change #5	7/1/2023	\$ 1,289.74	\$ 1,706.09	\$ 2,995.83	Yes	N/A		
Post Admin Start	2/1/2019	Change #6	7/1/2024	\$ 1,289.74	\$ 1,448.37	\$ 2,738.11	Yes	N/A		
		Change #7				\$ -	Yes	N/A		
		Change #8				\$ -	Yes	N/A		
		Change #9				\$ -	Yes	N/A		
	Amounts Due			Date Post Pmts. Received	Amt Received	Difference	Date Pre Pmts. Received	Arrears Pmts	Payments Due	Pymt Amts Due
	P & I	Escrow	Total							
Feb-19	1289.74	1242.25	2531.99	2/8/2019	2531.99	0.00	5/11/2021	634.76		
Mar-19	1289.74	1242.25	2531.99	3/8/2019	2531.99	0.00	6/8/2021	870.45		
Apr-19	1289.74	1242.25	2531.99	4/9/2019	2531.99	0.00	7/8/2021	938.06		
May-19	1289.74	1161.04	2450.78	5/7/2019	2450.78	0.00	8/9/2021	904.26		
Jun-19	1289.74	1161.04	2450.78	6/28/2019	2450.78	0.00	9/8/2021	879.22		
Jul-19	1289.74	1161.04	2450.78	7/31/2019	2450.78	0.00	10/11/2021	879.22		
Aug-19	1289.74	1161.04	2450.78	8/31/2019	2450.78	0.00	11/8/2021	879.22		
Sep-19	1289.74	1161.04	2450.78	9/6/2019	1910.00	540.78	12/7/2021	882.11		
Oct-19	1289.74	1161.04	2450.78	9/13/2019	2450.78	0.00	1/11/2022	1764.22		
Nov-19	1289.74	1161.04	2450.78	10/3/2019	540.78	1910.00	3/8/2022	882.11		
Dec-19	1289.74	1161.04	2450.78	11/29/2019	2450.78	0.00	4/12/2022	882.11		
Jan-20	1289.74	1161.04	2450.78	1/8/2020	2450.78	0.00	5/9/2022	812.62		
Feb-20	1289.74	1161.04	2450.78	1/27/2020	2450.78	0.00	5/9/2022	69.49		
Mar-20	1289.74	1161.04	2450.78	2/6/2020	2450.78	0.00	6/9/2022	882.11		
Apr-20	1289.74	1161.04	2450.78	3/5/2020	2450.78	0.00	7/11/2022	882.11		
May-20	1289.74	1196.05	2485.79	Consent Order	0.00	2485.79	8/8/2022	882.11		
Jun-20	1289.74	1196.05	2485.79	funds from Trustee	4908.24	-2422.45	9/7/2022	882.11		
Jul-20	1289.74	1196.05	2485.79		0.00	2485.79	10/20/2022	882.11		
Aug-20	1289.74	1196.05	2485.79		0.00	2485.79	11/28/2022	882.11		
Sep-20	1289.74	1196.05	2485.79		0.00	2485.79	12/17/2022	893.66		
Oct-20	1289.74	1196.05	2485.79		0.00	2485.79	1/24/2023	893.66		
Nov-20	1289.74	1196.05	2485.79		0.00	2485.79		893.66		
Dec-20	1289.74	1196.05	2485.79	12/8/2020	2597.23	-111.44	3/23/2023	893.66		
Jan-21	1289.74	1196.05	2485.79		0.00	2485.79	4/11/2023	893.66		
Feb-21	1289.74	1196.05	2485.79		0.00	2485.79	5/17/2023	1069.06		
Mar-21	1289.74	1196.05	2485.79		0.00	2485.79	6/16/2023	1069.06		
Apr-21	1289.74	1196.05	2485.79	4/5/2021	2450.78	35.01	7/31/2023	1069.06		
May-21	1289.74	1224.38	2514.12	5/4/2021	2520.80	-6.68	8/29/2023	1079.26		
Jun-21	1289.74	1224.38	2514.12	6/7/2021	2514.12	0.00	9/20/2023	1079.26		
Jul-21	1289.74	1224.38	2514.12	7/9/2021	2514.12	0.00	10/18/2023	1079.26		
Aug-21	1289.74	1224.38	2514.12	8/4/2021	2514.12	0.00	11/14/2023	1079.26		
Sep-21	1289.74	1224.38	2514.12	9/3/2021	28.33	2485.79	12/11/2023	1066.47		
Oct-21	1289.74	1224.38	2514.12	10/1/2021	2514.12	0.00	1/18/2024	1066.47		
Nov-21	1289.74	1224.38	2514.12	11/5/2021	2514.12	0.00	2/15/2024	1066.47		
Dec-21	1289.74	1224.38	2514.12	12/2/2021	1267.19	1246.93	3/16/2024	1066.47		
Jan-22	1289.74	1224.38	2514.12	1/6/2022	1275.26	1238.86	4/11/2024	1066.47		
Feb-22	1289.74	1224.38	2514.12	2/4/2022	2542.45	-28.33	6/13/2024	1345.33		
Mar-22	1289.74	1224.38	2514.12	3/2/2022	2542.45	-28.33		0.00		
Apr-22	1289.74	1224.38	2514.12	4/12/2022	2542.45	-28.33		0.00		
May-22	1289.74	1241.03	2530.77	5/2/2022	2530.77	0.00		0.00		
Jun-22	1289.74	1232.54	2522.28	6/7/2022	2530.77	-8.49		0.00		
Jul-22	1289.74	1241.03	2530.77	7/8/2022	2530.77	0.00		0.00		
Aug-22	1289.74	1241.03	2530.77	8/4/2022	2530.77	0.00		0.00		
Sep-22	1289.74	1241.03	2530.77	9/1/2022	2530.77	0.00		0.00		
Oct-22	1289.74	1241.03	2530.77	10/1/2022	2530.77	0.00		0.00		
Nov-22	1289.74	1241.03	2530.77	11/1/2022	2530.77	0.00		0.00		
Dec-22	1289.74	1241.03	2530.77	12/5/2022	2530.77	0.00		0.00		
Jan-23	1289.74	1241.03	2530.77	1/4/2023	2530.77	0.00		0.00		
Feb-23	1289.74	1241.03	2530.77	2/3/2023	2530.77	0.00		0.00		
Mar-23	1289.74	1241.03	2530.77	3/1/2023	2530.77	0.00		0.00		
Apr-23	1289.74	1241.03	2530.77	4/5/2023	2530.77	0.00		0.00		
May-23	1289.74	1241.03	2530.77	5/5/2023	2530.77	0.00		0.00		
Jun-23	1289.74	1241.03	2530.77	6/14/2023	2530.77	0.00		0.00		
Jul-23	1289.74	1706.09	2995.83	7/17/2023	2995.83	0.00		0.00		
Aug-23	1289.74	1706.09	2995.83	8/16/2023	2995.83	0.00		0.00		
Sep-23	1289.74	1706.09	2995.83	9/13/2023	2995.83	0.00		0.00		
Oct-23	1289.74	1706.09	2995.83	10/11/2023	2530.77	465.06		0.00		
Nov-23	1289.74	1706.09	2995.83	11/7/2023	2530.77	465.06		0.00		
Dec-23	1289.74	1706.09	2995.83	12/12/2023	2530.77	465.06		0.00		
Jan-24	1289.74	1706.09	2995.83	1/5/2024	2530.77	465.06		0.00		
Feb-24	1289.74	1706.09	2995.83	2/10/2024	2530.77	465.06		0.00		
Mar-24	1289.74	1706.09	2995.83	3/5/2024	2530.77	465.06		0.00		
Apr-24	1289.74	1706.09	2995.83	4/3/2024	2530.77	465.06		0.00		
May-24	1289.74	1706.09	2995.83	5/2/2024	2530.77	465.06		0.00		
Jun-24	1289.74	1706.09	2995.83	6/5/2024	2530.77	465.06		0.00		
Jul-24	1289.74	1448.37	2738.11	7/3/2024	2738.11	0.00		0.00		
Aug-24	1289.74	1448.37	2738.11	8/2/2024	2738.11	0.00		0.00		
Sep-24	1289.74	1448.37	2738.11	9/6/2024	2738.11	0.00		0.00		
Oct-24	1289.74	1448.37	2738.11	10/3/2024	2738.11	0.00		0.00		
Nov-24	1289.74	1448.37	2738.11	11/6/2024	2738.11	0.00		0.00		
Dec-24	1289.74	1448.37	2738.11	12/4/2024	2738.11	0.00		0.00		
Jan-25	1289.74	1448.37	2738.11	1/6/2025	2738.11	0.00		0.00		
Feb-25	1289.74	1448.37	2738.11	2/6/2025	2738.11	0.00		0.00		

Mar-25	1289.74	1448.37	2738.11	3/5/2025	2738.11	0.00	0.00		
Apr-25	1289.74	1448.37	2738.11	4/2/2025	2738.11	0.00	0.00		
May-25	1289.74	1448.37	2738.11	5/6/2025	2738.11	0.00	0.00	5/1/2025	2738.11
Jun-25	1289.74	1448.37	2738.11	Pre petition Arrears	0.00	2738.11	0.00	6/1/2025	2738.11
	0.00	0.00	0.00	funds from Trustee	30332.47	-30332.47	0.00		
	0.00	0.00	0.00		0.00	0.00	0.00		
	0.00	0.00	0.00		0.00	0.00	0.00		
	0.00	0.00	0.00		0.00	0.00	0.00		
	0.00	0.00	0.00		0.00	0.00	0.00		

\$ 99,309.98	\$ 101,923.84	\$201,233.82	<b>Amount Paid</b>	\$ 197,447.21	\$ 3,786.61	\$ 35,240.71	5/1/2025	\$ 5,476.22
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Post Petition Due Date 5/1/2025  
Amount Due \$ 3,786.61  
Debtor Suspense \$ 1,689.61

PCN Write Off	\$ -
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DLQ1 DUE Amt	Difference
\$ 3,786.61	\$ (0.00)
PreArrears	\$ (35,240.71)
Balance Due	\$ (35,240.71)
Difference	\$ (35,240.71)